

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )

v. )

WILLIAM BELISLE )

) Criminal Action No.: 05-30051-MAP  
)  
)

FILED  
IN CLERK'S OFFICE  
2012 21 4 11:58  
U.S. DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

---

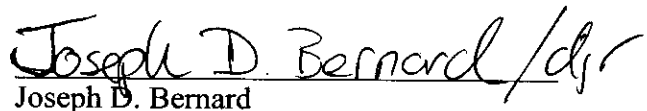
MOTION FOR DOWNWARD DEPARTURE

---

Now comes, William Belisle, in the above-entitled matter and respectfully moves this Honorable Court for a Downward Departure. In support thereof, William Belisle, states that such a downward departure is warranted for the following reasons:

1. When taking into account the totality of circumstances in this matter, a downward departure is warranted under U.S.S.G. 5K2.0 and Koon v. United States, 518 U.S. 81 (1996); and
2. Alternatively, the Supreme Court's decision in United States v. Booker, 543 U.S. 220 (2005) which rendered the guidelines advisory, the sentencing factors listed in 18 U.S.C. § 3553(a), and the totality of circumstances surrounding Mr. Belisle in this matter make a sentence of twenty-four (24) months proper and just.

Respectfully Submitted,  
William Belisle  
By His Attorney:

  
Joseph D. Bernard

The Law Offices of Joseph D. Bernard, P.C.  
73 State Street, Suite 301  
Springfield, MA 01103  
(413) 731-9995  
(413) 730-6647  
BBO#: 557986

Date: February 21, 2006